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 CENTRIPETAL NETWORKS, LLC,  
 STEVEN ROGERS, AND JONATHAN ROGERS

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION**

ALBERT RICHARDS,  
 Plaintiff,

v.

CENTRIPETAL NETWORKS, LLC f/k/a  
 CENTRIPETAL NETWORKS, INC.; STEVEN  
 ROGERS; JONATHAN ROGERS; and JOHN  
 DOES 1-10,  
 Defendants.

Case No.: 4:23-cv-00145-HSG

**STIPULATION AND ORDER TO EXTEND  
 TIME FOR RESPONSE TO FIRST  
 AMENDED COMPLAINT AND TO FILE  
 SECOND AMENDED COMPLAINT**

Civil L.R. 6-1(b), 6-2, 7-12

Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, Plaintiff Albert Richards (“Plaintiff”) and Defendants Centripetal Networks, Inc., Steven Rogers and Jonathan Rogers (collectively, “Defendants”) stipulate as follows:

On January 2, 2024 (Dkt. No. 50), the Court issued its Order Granting in Part and Denying in Part Defendants’ Motion to Dismiss Plaintiff’s First Amended Complaint (Dkt. No. 35). Pursuant to Federal Rule of Civil Procedure 12(a)(4), Defendants’ Response to Plaintiff’s First Amended Complaint would be due January 16, 2024. Pursuant to the Order, Plaintiff shall file any Second Amended Complaint no later than January 23, 2024. A case management conference is set for February 6, 2024, with a joint case management statement due by January 30, 2024.

The parties have met and conferred and agreed that:

- Plaintiff may file his Second Amended Complaint no later than **January 26, 2024**; and
- In the event that Plaintiff does not file a Second Amended Complaint, Defendants may respond to Plaintiff’s First Amended Complaint by **January 31, 2024**.

The parties do not request any modification to the January 30, 2024 joint case management statement deadline or February 6, 2024 case management conference.

There have been four previous time modifications in this case: (1) extending the time to respond to the original Complaint and Defendants’ Administrative Motion to Seal (Docket No. 12, filed 1/31/23); (2) extending the dates for briefing on Defendants’ motion to dismiss the original Complaint (Dkt. No. 23, filed 2/2/23); (3) continuing the initial CMC and related discovery deadlines, in light of Defendants’ original motion to dismiss (Dkt. No. 25, filed 3/13/23); and (4) extending the dates for briefing on Defendants’ motion to dismiss the First Amended Complaint (Dkt. No. 37, filed 4/19/23).

1           **IT IS SO STIPULATED.**

2 Dated: January 16, 2024

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4                           LEWIS & LLEWELLYN LLP

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6                           By: *s/ Kenneth M. Walczak*

7                           Marc R. Lewis  
8                           Kenneth M. Walczak

9                           Attorneys for Plaintiff  
10                          ALBERT RICHARDS

11 Dated: January 16, 2024

12                           KRAMER LEVIN NAFTALIS & FRANKEL LLP

13                           By: *s/ Jonathan Wagner*

14                           Jonathan Wagner

15                           ROPERS MAJESKI PC

16                           Todd A. Roberts  
17                           Martin D. Dioli

18                           Attorneys for Defendants  
19                           CENTRIPETAL NETWORKS, LLC, JONATHAN  
20                           ROGERS, AND STEVEN ROGERS

**ORDER**


Having reviewed the parties' stipulation, and good cause appearing therefor, the Court orders as follows:

- Plaintiff may file a Second Amended Complaint no later than **January 26, 2024**; and
- In the event that Plaintiff does not file a Second Amended Complaint, Defendants may respond to Plaintiff's First Amended Complaint by **January 31, 2024**.

The February 6, 2024 case management conference with a joint case management statement due by January 30, 2024 remain set.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 1/17/2024

  
Hon. Haywood S. Gilliam, Jr.  
UNITED STATES DISTRICT JUDGE